



**Montana Department of
ENVIRONMENTAL QUALITY**

1075067 - R8 SDMS
COPY

Brian Schweitzer, Governor

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April 9, 2008

Mr. Jon Nickel
Asarco Inc.
East Helena Plant
P.O. Box 1230
East Helena, MT 59635

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APR 14 2008
Office of Enforcement
Compliance & Environmental
Justice

Subject: 2008 Work Plan Review - Asarco East Helena Plant

Dear Mr. Nickel:

Pursuant to Section IV of the Administrative Order on Consent, Docket No. HW-07-01, the Department and EPA have reviewed the 2008 Cleaning and Demolition Project Work Plans dated March 12, 2008. The plans were designed to remove, store, and properly dispose or recycle all remaining hazardous waste and recyclable materials in calendar year 2008 from the process units identified in the Work Plans.

The Department's and EPA plan review comments are attached to this letter.

Please review the attached comments and provide a response to the Department on or before April 18, 2008.

If you have any questions or need further assistance, please feel free to contact me at (406) 444-5852 or e-mail me at ijohnson@mt.gov.

Sincerely,

Iver L. Johnson
HW Specialist
WUTM Bureau

cc: Hall, Mark (DEQ WUTMB)
Kirkpatrick, Denise (DEQ WUTMB)
Arrigo, John (DEQ ENF)
Schmidt, Carol (DEQ DIR/LEGAL)
Jacobson, Linda (EPA Region VIII)

2008 **ASARCO** CLEANING AND DEMOLITION PROJECT
INTRODUCTION, PROJECT SUMMARY, AND REPORTING

MDEQ/EPA PLAN REVIEW COMMENTS

Page 2 of 9 - Para 2: The implementation of the 2008 Cleaning and Demolition Project Work Plan, in accordance with Montana's 2007 Administrative Order on Consent (AOC), is not dependent upon EPA's approval of the final capping plan. The Department understands that an e-mail was sent to Asarco from EPA on March 18, 2008, informing them that Asarco should plan on installing temporary caps for areas demolished in 2008. Asarco/URS Corporation should adhere to the 2008 Cleaning and Demolition Project Construction Schedule as outlined in Attachment B.

Page 2 of 9 and 4 of 9, and Page 16 of 23: EPA has not approved implementation of the February 13, 2008 Cover System Design Report and has directed the company to install temporary covers over the demolition footprint areas, as necessary during the 2008 demolition season.

Page 3 of 9 - Para 1: Previous clean-up and demolition plans submitted to Department list an Alternate A and Alternate B table of structures that are scheduled to be cleaned and demolished for the year. Please provide and update section 2.0 to reflect Alternate A & B structures to be cleaned and demolished in 2008.

Page 4 of 9 - Para 2: Please specify what remaining features/structures (interior walls, footings, existing foundations, etc.) will not be removed and be brought to grade

Page 5 of 9 - Para 2: Please specify what remaining features/structures (interior walls, footings, existing foundations, etc.) will not be removed and be brought to grade.

Page 5 of 9, Section 4.4, and Page 17 of 23: It is recommended that the temporary covers be anchored with something more sturdy than sand bags.

2008 CLEANING AND DEMOLITION PROJECT
URS CORPORATION WORK PLAN

MDEQ/EPA PLAN REVIEW COMMENTS

Page 1 of 23 – Para 3: See the Department's comments above concerning Page 3 of 9 from the Introduction, Project Summary and Reporting Plan.

Page 6 of 23: Section 1.6, Temporary Conveyance Systems for Surface Water, please identify which existing collection trenches and sumps will be used during decon activities. The contractor should ensure that any collected solids are removed at the conclusion of the 2008 season. Asarco should ensure that their wastewater permit allows treatment of this contaminated water.

Page 6 of 23: Section 2.0, the text should indicate where the universal wastes, PCB and non-PCB ballasts and mercury containing equipment will be stored and who will inspect and dispose of it.

Page 7 of 23: In the second full paragraph, demolition of the flues is being conducted pursuant to a separate work plan, so an explanation here of how that "cohesive area unit with like contamination" will be addressed would be beneficial or remove this reference to the flue. Last paragraph, this should be removed from this work plan and included in the EPA flue demolition work plan, including special pre-cleaning procedures.

Page 8 of 23: Section 2.2, the text should specify where the 55-gallon drums of sludge removed by triple-rinsing of the acid tanks will be disposed. This waste should be tested for pH and neutralized if necessary. In addition, the Department has concerns on how characteristic corrosive wastes such as iron sulfates from the acid plant pump tank building floor or other locations will be handled. Asarco should elaborate on how this waste will be treated prior to disposal, including provisions to prevent releases during storage and transportation.

Page 8 of 23: Section 2.2, Asarco should confirm that their wastewater treatment system permit allows acceptance of the cleaning and washing waters from the acid tanks.

Page 8 of 23: Section 2.4, Removal of Oils from Site Equipment (if Discovered), the text should indicate where the removed oils will be stored and labeled and who will be responsible for ultimate disposal.

Page 13 of 23: The baghouse flue and monier flue demolition are subject to the EPA work plan and descriptions of their demolition should be removed from this plan.

Page 14 of 23 – Para 5: Please notify the Department within 72 hours prior to stack demolition and provide the Department the plan that indicates a safe viewing location for the media, general public and personnel involved with the demolition.

Page 15 of 23 and 17 of 23: URS states that they anticipate utilizing 25 to 35 ton rock trucks, side dump trucks, and/or 10-wheel dump trucks to haul material to the CAMU. Trucks of this size are not acceptable to drive directly on the 24 inch cushion layer. The Department believes that at a minimum, all roadways, turnouts, staging, and dumps used by equipment hauling waste must have at least 36 inches of material over the liner. The company must ensure that wastes hauled to the CAMU in this size of vehicle are not allowed to drive on the cell, but, merely dump the loads for placement in the cell by appropriately weighted and sized equipment.

Page 15 of 23: Use of a water truck to wet haul routes for dust control was not anticipated during CAMU operation [please refer to Appendix E of the CAMU design, Section 3.7.1]. The Department and EPA question the necessity of water trucks, since street sweepers are to be used to clean up dust and debris, and are concerned with infiltration impacts to the existing groundwater plumes from wetting these highly contaminated areas. Asarco should adhere to the CAMU Operating Plan.

Pages 15 and 16 of 23, Section 5.6, Plug and Abandon Underground Piping: This is a corrective action activity and should be removed from this demolition work plan. Asarco must discuss plugging and abandoning with EPA.

Page 16 of 23, Section 5.7: Last paragraph, first sentence, the blast furnace flue is a portion of the EPA work plan.

Page 18 of 23 – Dust Control Plan: The Section has provided a copy of Asarco's Dust Control Plan (Section 6.0 through 6.8) to the Department's ARMB's Air Compliance Supervisor, Mr. Dan Walsh, for their review. ARMB may request more information about the adequacy and appropriateness of the proposed dust control measures after their review.

Page 18 of 23, Section 6.1, Application with Water during Demolition: Please see prior concerns for infiltration impacts from keeping all work areas wet with 2000-gallon water trucks. URS also anticipates use of a Dust Boss, which can "drive it to the ground."

Page 20 of 23 – Water Source: What is the source of the water from the fill station?

Page 21 of 23: Section 7.2, Description of Solid Waste Disposal Options: The list should be expanded to discuss non-CAMU-eligible solid and hazardous wastes, including used oil, PCB ballasts, and universal wastes.

Page 22 of 23, Section 7.4, Labeling of Waste: For containers, labeled as "Non-Classified Waste Material; Laboratory Analysis in Progress", the label should also include a date. The text should be amended to specify an allowable time for a hazardous waste determination and appropriate disposal. The text should also indicate whether URS or Asarco will be the identified generator of the waste drums.

Page 22 of 23, Management of CAMU Approved Waste: The text should specify that the CAMU lifts will be applied with appropriate equipment as detailed in Appendix J, Specifications, of the CAMU design document.

Page 23 of 23 – Special Waste Handling and Segregation: Please provide the Department written details on how the Asbestos Siding Storage Pile next to the Blast Furnace Stack will be disposed of in accordance with State ACM regulations.

Figures 2, 3, 8, 10, 12, 13: Should be modified to remove the blast furnace flue and Monier flue portions since they are not part of this state work plan or designate on these that this demolition work is subject to approval under an EPA work plan.

Figure 7: Flow filling of underground utilities is a corrective action activity. The text and figure describing this work should be removed from the state work plan.

Figure 14: An interim permanent cap is not to be installed this year. The agencies suggest a more sturdy anchoring method be found for temporary caps than placement of sand bags.

2008 Schedule: The schedule should be amended to remove activities relating to the interim permanent cap.